

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF WEST VIRGINIA
AT CHARLESTON**

AMBER D. HALL,

Plaintiff,

v.

**GESTAMP WEST VIRGINIA, LLC,
BARRY HOLSTEIN, KENNETH
SUPRENANT & SCOTT HUGHES,**

Defendant.

Civil Action No.: 2:20-cv-00146

AFFIDAVIT OF SHAWN WATERS

1. My name is Shawn Waters, I am over the age of 18 years old. I worked at Gestamp West Virginia, LLC between Jan. 5, 2015 and May 8, 2020. I was working when Amber Hall was terminated.
2. I worked as a quality auditor, first shift. I have firsthand knowledge that Antione Anderson propositioned Sara Cook for sexual relations while Sara Cook was a subordinate to Antione Anderson, Kelly Carroll reported the relationship to Scott Hughes. Antione Anderson didn't face any discipline or investigation. Antione Anderson constantly propositioned female workers for sexual favors to which was common knowledge. Antione Anderson asked me, on a weekly basis, when I'm going "black". Suggesting that I have sex with a black man - Antione Anderson is a black man. Women that did sleep with Antione Anderson got promoted such Sara Cook, and Erica Haynes. I have personal knowledge that Erica Haynes did sleep with Antione Anderson. Erica Haynes also had sexual

relationships with Joel Jones, and Aaron Lambert. These relationships were also well known throughout the plant.

3. Antione Anderson recruited a female named Leann Hemingway from 3rd shift Lasers department, to first shift quality. Antione Anderson was having a sexual relationship with Leann Hemingway and allowed her to come in to work when she wanted, Antione Anderson also adjusted Leann Hemingway's time on her clock in to show that she would appear on time when she was not. Antione Anderson would sexually rub on her shoulders during working hours in front of the whole department.
4. I have personal knowledge that Bill Hardman was charged with sexual harassment while employed at Gestamp, namely Rhonda Holbert. Bill Hardman was not fired for the sexual harassment and was permitted to keep his job. I know personally this was also reported to Human Resources.
5. I have personal knowledge that Gestamp employee David Workman, and an employee that went by "Tiny" were both terminated after filing claims for FMLA leave.
6. I was personally sexually harassed by Ken Brooks. It was reported to Scott Hughes. Hughes didn't terminate Ken Brooks. I personally know that this was Ken Brooks' third complaint for sexual harassment at Gestamp. The first being a female name Haley (last name escapes me) (Haley was "air humped" by Ken Brooks), and a second female, then myself. Ken Brooks is still working at Gestamp and is close with Antione Anderson. Many supervisors at Gestamp knew about my complaints as to the sexual harassment forced upon me by Ken

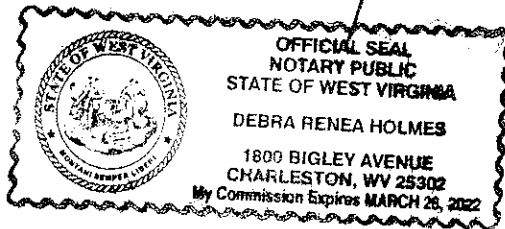
Brooks including David Underwood, Jimmy Rolland, Sandra King, Antione Anderson, Scott Hughes, and John Fields.

7. The sexual harassment by Ken Brooks was reported to Human Resources prior my evaluation. I had always got 4-5s on my evaluations. I was provided 2-3s on my evaluations after the sexual harassment was reported.
8. I have personal knowledge of Antione Anderson "dirty dancing" with subordinate female employees and purchasing drinks for them a Christmas Party 2018 in front of the whole company, including Scott Hughes. Antione Anderson was not disciplined.
9. I have direct knowledge that Scott Hughes physically grabbed Kathryn Kessler by the arm, amounting to unwanted physical contact. Gestamp then forced Kathryn Kessler to leave the company. Kathryn Kessler is a female.
10. Antione Anderson also told me personally to get Kelly Carroll to go out on a date with him. Kelly Carroll declined several times. Then Antione Anderson told me personally that he only needed "20 minutes" with Kelly Carroll implying that he just wanted to have sex with her.

COUNTY OF Kanawha TO-WIT:

Shawn Waters
Shawn Waters, November 19, 2020

Taken, subscribed and sworn to before me this 19th day of November
2020. My commission expires March 28, 2022.
Debra Renea Holmes
Notary Public



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**GESTAMP WEST VIRGINIA, LLC,
BARRY HOLSTEIN,
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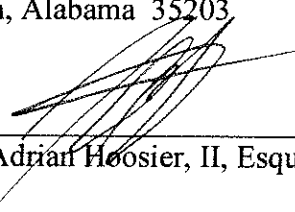
Defendants.

CERTIFICATE OF SERVICE

I, D. Adrian Hoosier, II, counsel for Plaintiff, do hereby certify that I have served the foregoing ***AFFIDAVIT OF SHAWN WATERS***, via United States District Court E-filing, on this the 20th day of November, 2020, to the following:

Hendrickson & Long, PLLC
Attention: Raj A. Shah
Post Office Box 11070
Charleston, West Virginia 25339

Burr & Forman, LLP
Attention: Ronald W. Flowers, Jr.
420 North 20th Street, Suite 3400
Birmingham, Alabama 35203



D. Adrian Hoosier, II, Esquire WVSB #10013